

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AIR PRODUCTS LLC,

Plaintiff,

vs.

CIECH, S.A.,

Defendant.

Case No. 5:12-cv-6953-JKG

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING**

Defendant Ciech, S.A. respectfully requests that the time for filing its responsive pleading be extended by forty-five days, until April 1, 2013. In support of this motion, Defendant states as follows:

1. Plaintiff Air Products LLC filed its Amended Complaint on December 18, 2012. A copy of the Summons and Amended Complaint was served on Defendant in Poland on January 25, 2013. Defendant's responsive pleading is currently due on February 15, 2013.
2. The Amended Complaint presents complex factual and legal allegations. All of Defendant's witnesses and documents are located in Poland, and there are language barriers that need to be overcome. Counsel for Defendant contacted counsel for Plaintiff to discuss an extension in order to allow Defendant additional time to prepare its responsive pleading.
3. Defendant has not previously sought any extension of time.

4. Plaintiff does not oppose a forty-five day extension of time for Defendant to file its responsive pleading.

5. With a forty-five day extension, Defendant's responsive pleading would be due on April 1, 2013.

6. This Motion does not waive jurisdictional or other defenses that may be available to Defendant.

February 13, 2013

Respectfully submitted,

WILMER CUTLER PICKERING
HALE and DORR LLP

/s/ Eric Mahr
Eric Mahr (PA Bar No. 59083)
David W. Ogden (*pro hac vice* application pending)
Jonathan E. Paikin (*pro hac vice* application pending)
1875 Pennsylvania Ave., N.W.
Washington, D.C. 20006
(202) 663-6703 (TEL)
(202) 663-6363 (FAX)
jonathan.paikin@wilmerhale.com

Attorneys for Ciech, S.A.

CERTIFICATE OF SERVICE

I certify that on the date set forth below the foregoing Unopposed Motion for Extension of Time to File Responsive Pleading and Proposed Order was electronically filed pursuant to the Court's CM/ECF system, and that the document is available for downloading and viewing from the CM/ECF system. Notice of this filing will be sent to all registered counsel of record by operation of the CM/ECF system.

February 13, 2013

/s/ Eric Mahr

Eric Mahr

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ORDER

NOW, this ____ day of February, 2013, upon consideration of Defendant's Unopposed Motion for Extension of Time to File Responsive Pleading, filed February 13, 2013, which motion is unopposed,

IT IS ORDERED that the motion is granted.

James Knoll Gardner
United States District Judge